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Attorneys for Defendant, THE REGENTS OF
THE UNIVERSITY OF CALIFORNIA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

San Francisco Division

DR. JORDAN SPATZ, M.D., Ph.D.,

Plaintiff,

vs.

REGENTS OF THE UNIVERSITY OF
CALIFORNIA,

Defendant.

Case No.: 21-cv-09605-LB

**JOINT STIPULATION CONCERNING
MODIFICATION OF THE SCHEDULING
ORDER RE EXPERT DISCOVERY**

Judge: Hon. Laurel Beeler

Pursuant to Local Rules 6-2 and 7-12 of the Northern District of California Civil Local Rules, Plaintiff Jordan Spatz, M.D., Ph.D, and Defendant The Regents of The University of California (the "Parties"), through their counsel of record, respectfully submit this joint stipulation and request. Pursuant to Local Rule 6-2(a), Rachel Winterle (counsel for The Regents)

concurrently submits a supporting declaration. The Parties, by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on September 25, 2023, the Court entered an amended Scheduling Order. (Dkt # 92).

WHEREAS, since December 22, 2023, the Parties have been meeting and conferring regarding an independent medical examination of Dr. Spatz and need additional time to complete those efforts and conduct and IME;

WHEREAS, the Parties have agreed to continue all deadlines related to expert discovery, without impacting the trial date.

Therefore, the Parties respectfully request the Court's approval for the following:

1. Modify the Scheduling Order as follows:

Case Event	Filing Date/Disclosure Deadline/Hearing Date	Proposed new date:
Expert disclosures required by Federal Rules of Civil	2/15/2024	February 29, 2024
Rebuttal expert disclosures	2/29/2024	March 15, 2024
Expert discovery completion date	3/15/2024	March 29, 2024

IT IS SO STIPULATED.

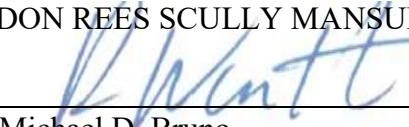
Dated: February 6, 2024

FORTHRIGHT LAW, P.C.

By: /s/ Dow W. Patten
Dow W. Patten
Attorneys for Plaintiff
Dr. Jordan Spatz, M.D., Ph.D.

Dated: February 6, 2024

GORDON REES SCULLY MANSUKHANI, LLP

By: 
Michael D. Bruno
Rachel Winterle
Attorneys for Defendant
The Regents of The University of California

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-4.3.4(a)(2)

I, Rachel Wintterle, am the ECF User whose identification and password are being used to file this Joint Case Management Conference Statement Concerning Modification of the Scheduling Order. In compliance with Civil Local Rule 5-1(i)(3) I hereby attest that all signatories concur in filing this document.

Dated: February 6, 2024

By: 

Rachel Wintterle

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

SO ORDERED.

Dated: February 7, 2024



Hon. Laurel Beeler
Judge of United States District Court
Northern District of California

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

San Francisco Division

DR. JORDAN SPATZ, M.D., Ph.D.,

Plaintiff,

vs.

REGENTS OF THE UNIVERSITY OF
CALIFORNIA,

Defendant

Case No.: 21-cv-09605-LB

**DECLARATION OF RACHEL
WINTTERLE IN SUPPORT OF JOINT
STIPULATION CONCERNING
MODIFICATION OF THE SCHEDULING
ORDER RE EXPERT DISCOVERY**

Judge: Hon. Laurel Beeler

Complaint Filed: December 13, 2021

Amended Complaint Filed: April 27, 2022

I, Rachel Wintterle, declare as follows:

1. I am an attorney at law licensed to practice before all courts of the State of California and a partner in the law firm of Gordon Rees Scully Mansukhani, LLP, attorneys for the defendant The Regents of the University of California ("The Regents"). I have personal

knowledge of the matters contained in this declaration and if called to testify to them could and would do so competently.

2. On September 25, 2023, the Court entered a Scheduling Order. (Dkt # 92).

3. On December 22, 2023, I emailed Plaintiff's counsel seeking an independent medical examination ("IME") of Plaintiff. Plaintiff's counsel responded on January 6, 2024 denying the request. On January 17, 2024, I emailed Plaintiff's counsel to further meet and confer regarding The Regents' request for Plaintiff to stipulate to an IME so that the parties could avoid motion practice. Plaintiff's counsel responded on January 19, 2024 indicating the possibility of an agreement under certain parameters. The parties are continuing to meet and confer regarding the scope of an IME.

4. On February 1, 2024, the parties filed a joint case management statement in which they asked the Court to continue all deadlines related to expert discovery to allow the parties' time to complete their meet and confer efforts and conduct and IME. The parties agreed to the following schedule:

Case Event	Filing Date/Disclosure Deadline/Hearing Date	Proposed new date:
Expert disclosures required by Federal Rules of Civil	2/15/2024	February 29, 2024
Rebuttal expert disclosures	2/29/2024	March 15, 2024
Expert discovery completion date	3/15/2024	March 29, 2024

Executed this 6th day of February, 2024 at San Francisco, California.


Rachel Wintterle